

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**IN RE TERRORIST ATTACKS ON
SEPTEMBER 11, 2001**

**Civil Action No.
03 MDL 1570 (GBD)(SN)**

This document relates to:

Burnett, et al. vs. Islamic Republic of Iran, et al., Case No. 15-CV-9903 (GBD)(SN)

MOTION TO SUBSTITUTE PARTIES

Pursuant to Federal Rule of Civil Procedure 15(d), Plaintiffs herein move the Court to allow substitution of the following parties in the above-referenced action. Two of these individuals are being substituted into the case because they were identified as “DOE” plaintiffs at the time that the case was initially instituted (or in the initial pleading in which their claims were asserted) and have since consented to being named in the Complaint according to their legal name. The third individual’s name has changed, and she wishes to proceed under her current name.

The following chart identifies the manner in which each of the Plaintiffs appears in the Amended Complaint in this case, 15-cv-9903 ECF No. 53, in addition to the location in the Amended Complaint where their claims may be found along with their nationality on September 11, 2001, and finally the new manner in which their claims should appear going forward:

Claim in Amended Complaint	¶ in Amended Complaint	Nationality on 9/11/2001	Claim following Substitution
SIBLING DOE AP264 in their own right as the Sibling of DOE AP264, Deceased	¶ 3324	UK	JOANNE LESLEY CUDMORE in her own right as the Sibling of Neil James Cudmore, Deceased
SIBLING DOE AP277 in their own right as the Sibling of DOE AP277,	¶ 3616	UK	WILLIAM C. WELLS in his own right as the Sibling of Vincent Michael Wells,

Deceased			Deceased
MONICA TORRES in their own right as the Sibling of Luis Eduardo Torres, Deceased	¶ 3405	Colombia	MONICA GUZMAN in her own right as the Sibling of Luis Eduardo Torres, Deceased

Plaintiffs propose that, upon endorsement of Plaintiffs' Proposed Order, each substituted party would be individually entered as a Plaintiff into the Court's ECF system to ease the burden on the Clerk of the Court's Office and the size of this MDL.

Dated: June 28, 2024

Respectfully submitted,

MOTLEY RICE LLC

/s/ John M. Eubanks

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